

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED  
R# 4682006624  
2012 JAN -4 PM 12:08

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LOUISIANA MUNICIPAL POLICE  
EMPLOYEES' RETIREMENT SYSTEM,

Plaintiff,

v.

GREEN MOUNTAIN COFFEE ROASTERS, INC.,  
ROBERT P. STILLER, LAWRENCE J. BLANFORD,  
FRANCES G. RATHKE, BARBARA D. CARLINI,  
WILLIAM D. DAVIS, JULES A. DEL VECCHIO,  
MICHAEL J. MARDY, HINDA MILLER, DAVID E.  
MORAN, MERRILL LYNCH, PIERCE, FENNER &  
SMITH INC., SUNTRUST ROBINSON  
HUMPHREY, INC., WILLIAM BLAIR &  
COMPANY, L.L.C., CANACCORD GENUITY INC.,  
JANNEY MONTGOMERY SCOTT LLC, PIPER  
JAFFRAY & CO., RBC CAPITAL MARKETS, LLC,  
WELLS FARGO SECURITIES, LLC, RABO  
SECURITIES USA, INC., AND SANTANDER  
INVESTMENT SECURITIES INC.,

Defendants.

Docket No. 2:11-cv-289

**MOTION FOR ADMISSION *PRO HAC VICE***

I, Robin A. Freeman, counsel for Plaintiff Louisiana Municipal Police Employees' Retirement System, hereby move this Court pursuant to Local Rule 83.1(b) to admit *pro hac vice* Michael D. Blatchley, of the law firm Bernstein Litowitz Berger & Grossmann LLP, for the purposes of this case only. Mr. Blatchley's supporting affidavit accompanies this Motion. The grounds for this Motion are as follows:

1. I am an attorney at the law firm of Lynn, Lynn & Blackman, P.C., 76 St. Paul Street, Burlington, Vermont. I am a member in good standing of the bar of the State of Vermont and of this Court. I am counsel for Plaintiff in this matter and have entered my appearance.

2. Mr. Blatchley is an attorney of the law firm Bernstein Litowitz Berger & Grossmann LLP, 1285 Avenue of the Americas, New York, New York, 10019, telephone: (212) 554-1281, fax: (212) 554-1444, and email: [michaelb@blbglaw.com](mailto:michaelb@blbglaw.com).

3. Mr. Blatchley is a member of the bar of the State of New York and the State of New Jersey and is admitted to practice in the United States District Court for the Southern District of New York and the District of New Jersey. He is a member in good standing and eligible to practice in each of the courts in which he has been admitted and is not currently suspended or disbarred in any jurisdiction and is not the subject of any disciplinary proceedings. *See* attached Affidavit of Michael D. Blatchley.

4. Plaintiff seeks the admission of Mr. Blatchley for the purposes of representing it in this action.

5. Mr. Blatchley will remain at all times associated in this case with the undersigned counsel in accordance with Local Rule 83.1(b)(4).

#### **MEMORANDUM OF LAW**

Pursuant to Local Rule 83.1(b), the Court has discretion to admit any member in good standing of a bar of another federal court, or of the highest court of any state, to practice in this Court with respect to a particular action. This Motion and Mr. Blatchley's Affidavit show that Mr. Blatchley meets the requirements of Local Rule 83.1(b)(2). Lynn, Lynn & Blackman, P.C. has already entered its appearance, and Mr. Blatchley is associated with Lynn, Lynn &

Blackman, P.C. for all purposes recited in Local Rule 83.1(b)(4). Plaintiff therefore requests that the Court grant this motion for *pro hac vice* admission.

Dated: Burlington, Vermont  
January 4, 2012

**LYNN, LYNN & BLACKMAN, P.C**

A handwritten signature in dark ink, appearing to read 'Robin Freeman', is written over a horizontal line.

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*Liaison Counsel for Plaintiff*